

If there is any concern for controlling the cost of health care, it was not part of the discussion on this change. Nexium continues to be one of the top five prescribed drugs when we review employer plan drug claims. Nexium's monthly cost is generally between \$140 and \$180 per month. The chemical formulation of Prilosec OTC or simply Omeprazole OTC varies only slightly from Nexium, and the active ingredient is the same. Prilosec/Omeprazole OTC is generally less than \$24 per month.

Any reasonable physician, who would be told by a patient that Nexium was too expensive, would clearly recommend the OTC alternative. Their natural presumption is that the OTC is not covered and Nexium is. Requiring an Rx from the consumer simply places a barrier in the way of the consumer who is trying to purchase the best value.

I have heard from individuals that, when a person arrives with an Rx for an OTC drug, pharmacists literally take a bottle or package of an OTC medicine off the counter, open it and distribute it in a container like an FDC controlled package. One indicated that they filled only one month's supply and put the rest of the product on the shelf for the next person with that Rx – but charged the individual the full shelf price.

As a benefits consultant for 44 years, I view the changes for OTC medicines as having one valuable benefit. It was a sufficient trade-off for the drug companies in exchange for their early buy-in to the administration's health care reform platform.

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